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August 3, 2011

**Via ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: The Professionals for Lifeline and Link-Up Reform  
Ex Parte Presentation – WC Docket No. 11-42, CC Docket No. 96-45, and WC  
Docket No. 03-109**

Dear Ms. Dortch:

On June 13 and 14, 2011, the Commission held a workshop on the development of a low income database for the Lifeline and Link Up programs (“Lifeline/Link Up”), which followed on the Commission’s Notice of Proposed Rulemaking in the above referenced dockets.<sup>1</sup> Following this workshop, an invitation was sent to all workshop participants as well as other interested parties inviting them to participate in developing an industry recommendation. The Professionals for Lifeline and Link-Up Reform (“PLLR”)<sup>2</sup> was formed by those interested in participating in the process. Since the workshop, the PLLR collaborated on a proposal to facilitate the adoption and implementation of the database by addressing key issues and providing greater specification. The PLLR also encouraged those industry participants who were unable to participate to use the PLLR proposal as a basis for developing their own proposal.

<sup>1</sup> *In the Matter of Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42, CC Docket No. 96-45, and WC Docket No. 03-109, Notice of Proposed Rulemaking (rel. Mar. 4, 2011).

<sup>2</sup> The PLLR consists of CGM, LLC; CompTel; DPI Teleconnect; Emerios, a division of VMBC Corporation; Global Connections, Inc.; Image Access, Inc.; i-wireless, LLC; Midwestern Telecom, Inc.; Stand Up Wireless, LLC; TAG Mobile, LLC; Telrite, d/b/a/ Life Wireless; Terracom, Inc.; TracFone; West Corporation; and YourTel America.

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A copy of the PLLR's proposal is attached. As discussed therein, through their considerable experience in developing and operating real-time or near real-time lifeline-related databases for entities engaged in Lifeline/Link Up, the PLLR believe the Commission can maximize its chances of success in implementing the database -- the Eligibility and Duplicate Management Platform ("EDMP") -- by adopting a phased approach to integrating functionalities. By moving in stages, the Commission can build upon the interim solutions currently being deployed by ETCs and third-party service bureaus and can drive the implementation of the EDMP to which all impacted parties (ETCs, states, USAC, FCC) may integrate with the minimum needed to change their processes.

In the first phase of the solution, which could be accomplished within months after a Commission formal rulemaking, a neutral third-party administrator would develop and implement, as part of the EDMP, a Duplicate Elimination and Preference Management System ("DEPM" or "Phase I") which would provide a carrier-neutral pre-qualification process to identify and verify whether a household or individual is already receiving a Lifeline/Link Up benefit and enable thereby the elimination of duplicate benefits. The PLLR proposal is primarily focused on the requirements for the Phase I solution.

The second phase ("Phase II"), which would likely take more than 6 months to implement, would be the implementation of a technological solution to enable the full qualification of a consumer as well as automated annual verifications. Phase II would build on the structure and systems developed in Phase I, thus dramatically reducing the cost and effort required to expand the functionality of the DEPM. Through the addition of a state administration interface, Phase II would allow a state to configure, manage, and audit the dynamic rules engine created in Phase I to the state's documentation requirements, thereby providing ETCs, solution providers, and state administrators an automated process for determining the eligibility of Lifeline/Link Up enrollees. In addition, states could easily integrate their state eligibility data warehouses with Phase II and thus allow the ETCs to access their data warehouses through Phase II in real-time. Duplicate elimination and preference management would continue during Phase II.

Should the Commission wish to discuss this proposal, please contact the undersigned counsel.

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This letter is being filed electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joan M. Griffin". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Joan M. Griffin  
*Counsel for Emerios*

cc: Kimberly Scardino  
Jonathan Lechter